



August 31, 2022

**VIA ECF**

Hon. Katherine Polk Failla  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Taveras v. New York City, et al.  
20 Civ. 01200 (KPF)

Your Honor,

I represent the plaintiff, Alan Taveras, in the above-referenced matter. I write on behalf of all parties to inform the Court regarding the intended path forward in this action.

By way of (abbreviated) background, this action was commenced on February 11, 2020, which was amended on April 6, 2020. Defendants filed a pre-motion letter on May 4, 2020, Plaintiff responded the same day. The Court dispensed with the requirement of a pre-motion conference; Defendants' Motion to Dismiss was fully submitted on September 9, 2020. The Court issued an Opinion and Order on January 17, 2021 granting Defendants' motion and dismissing the First Amended Complaint. Plaintiff appealed to the Second Circuit; on August 2, 2022 the Circuit Court vacated the January 17, 2021 Opinion and Order and remanded the matter for further proceedings in light of the Supreme Court's decision in *Bruen*.

In accordance with the Court's August 3, 2022 Order, the parties propose that Plaintiff file a Second Amended Complaint on or before September 23, 2022 to narrow the claims before the Court. Defendants will thereafter proceed either with filing an Answer or a pre-motion letter within the statutory timeframe. Thank you for the Court's consideration.

Sincerely,

*Amy L. Bellantoni*  
Amy L. Bellantoni

cc: Kerri Devine